ECS
LAKESIDE OFFICE PARK
607 NORTH AVENUE, SUITE 11
WAKEFIELD, MA 01880
781-246-8897
FAX: 781-246-8950
WWW.ECSCONSULT.COM

February 3, 2005

Mr. Christopher Pyott, Environmental Analyst
Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup
One Winter Street
Boston, MA. 02108

Dear Mr. Pyott:

Subject: Response to Town of Wilmington Comments and Supplemental Information
Construction Release Abatement Measure (CRAM) Plan
Redevelopment of Former Olin Corporation Facility
51 Eames Street, Wilmington, MA
RTN 3-0471

On behalf of New England Transrail, LLC (NET), Environmental Compliance Services, Inc. (ECS) is providing supplemental information and submitting this response to comments received by the Massachusetts Department of Environmental Protection (MADEP) from the Town of Wilmington regarding the Construction Related Release Abatement Measure Plan (CRAM) and Focused Feasibility Study (FFS) dated November 18, 2004. This CRAM addresses the proposed redevelopment of the Olin Property at 51 Eames Street in Wilmington, Massachusetts, referred to herein as the NET Development Area. These documents are supported by a Focused Site Characterization (FSC) and Focused Risk Assessment (FRA) prepared by Olin Corporation's consultant MACTEC, which was submitted separately to MADEP on October 4, 2004.

In a letter to the MADEP dated December 21, 2004, GeoInsight, Inc. performed a review of the CRAM Plan for the Town of Wilmington and raised a number of concerns regarding the proposed plans to reconstruct the cap over the Dense Aqueous Phase Liquid (DAPL) Containment Area. Specific concerns address three railroad sidings and bulk storage facilities for sand, gravel, salt, wood chips lumber, etc. being located on top of the cap. It is their opinion that these activities will (1) subject the cap installed over the DAPL Containment Area to considerable live and static loads that are not described or analyzed in the CRAM Plan; and (2) design information presented in the CRAM Plan item (i)(4) of Section 3.2 and Drawings T-1, C-1 through C-9, and S-1 are not adequate for MADEP to review the ability of the cap to withstand the effects of the transloading and bulk storage activities.

The following are ECS's response to specific comments raised by GeoInsight on behalf of the Town of Wilmington for consideration by the Massachusetts Department of Environmental Protection (MADEP):

1. ***Should the cap fail due to these activities (proposed transloading and storage facilities), it is possible that infiltrating runoff will connect beneath the cap and within the containment area, changing the hydraulic conditions within the Containment Area. These changes, combined with the physical constraints of the wall, could result in unpredictable effects on***

the DAPL in the form of induced downward vertical flow gradients or outflow of impacted groundwater through or over the wall, resulting in possible impacts on groundwater outside the containment system with attendant potential exposures to human and ecological receptors.

It is NET's intent to install a permanent cap over the DAPL Containment Area that will meet the requirements established by MADEP for reduced infiltration, and which will also be suitable to withstand all uses that may be considered by NET. This approach is consistent with the future use conditions that have been anticipated for the 51 Eames Street Property since 2000. It will be NET's obligation to inspect and maintain the permanent cap, in accordance with MADEP approval or policy. Additionally, long term monitoring plans for the cap and nearby areas at the Property have been incorporated into a Post Construction Monitoring Plan, which is subject to MADEP approval, and cannot be modified without MADEP approval. It must be noted that the permanent cap is proposed only to substantially limit the infiltration of water into containment area. The cap is not required to prevent contact with soils within the containment area.

The original cap, installed in 2001 over the DAPL Containment Area, consisted of overlapping sheets of 6-mil thick polyethylene that were exposed to the elements. Due to deterioration of the original membrane, in 2003 the temporary cap was upgraded with the installation of a second membrane consisting of an 8-mil thick scrim reinforced polyethylene placed directly over the previous membrane. Adjoining sheets were joined using tape. It is important to note that the temporary cap that currently exists, is not designed to be completely impermeable, and allows some surface water infiltration into the containment area. Groundwater monitoring within and around the cap since 2001 has demonstrated that the current temporary cap and containment wall are functioning as intended.

Although GeoInsight puts forth a scenario of a cap failure, the potential failure mechanism is not presented. Based on the design criteria for the cap and the requirement to eliminate 90% surface water infiltration, a sudden or catastrophic failure of the cap is not possible. The removal of a portion of the cap, or significant and visible degradation of the entire cap, for a significant period of time, would likely be required before the cap permitted significant infiltration, or "failed." Given that the groundwater will be monitored on at least a semi-annual basis to check the hydrologic conditions within and around the containment wall, and will be visually inspected more frequently, it is unlikely that the cap will be permitted to "fail."

The proposed cap, with 5-inch thick asphalt pavement on the surface and a 60-mil HDPE geomembrane below, even if damaged would likely transmit less water than the existing temporary cap to groundwater. Additional new impacts to groundwater outside of the containment wall will not occur and infiltration through the final cap will be substantially less than the 10% allowed.

2. ***The design did not present an analysis of the dynamic and static loads on the cap that will be associated with proposed transloading and bulk storage activities to be conducted on its top nor was a stability analysis of the material underlying the current temporary cover liner presented. Analyses of potential cap settlement under the expected loads was not presented, nor were settlement monitoring plates included in the design to facilitate evaluation of and response to potential settlement before cap failure occurs.***

   The cap design did consider dynamic and static loading from activities to be conducted on the cap and the stability of underlying materials within the DAPL Containment Area. Since the DAPL Containment Area presently contains only sand, gravel, and stabilized materials, negligible settlement can occur. This assessment was based upon studies conducted and status reports prepared by GEI Consultants, Inc. on behalf of Olin Corporation and confirmed by ECS during the design phase of the project. Based upon geotechnical borings conducted in 2004, as discussed further in the Geotechnical Report in Attachment A, the cap will readily accommodate the proposed activities. Further details are presented below.

   As detailed in Appendix H of the Olin Corporation's Part 2 C RAM Status Report No. 2, prepared by GEI Consultants, Inc, and dated August 28, 2001, during the slurry cutoff trench/wall installation in 2000/2001, the surface of the DAPL containment area was modified by various activities. These areas were defined on Drawing No. 2 (copy attached) entitled "General Excavation and Backfill Locations," which included the following:

Area	Activity
Drum Area A and Buried Debris Area *(Location of the north slurry wall crossing)*	5' to 7' of Excavation and Backfill.
Drum Area B (*Location of east slurry wall crossing)*	4' to 6' of Excavation and Backfill.
Southeast Area (Wetlands removal)	3' to 5' of Removal of Organic Sediments followed by fill placement for slurry wall working pad.
West Area (Wetlands removal)	3' to 5' of Removal of Organic Sediments followed by fill placement for slurry wall working pad
Central Area	1' to 5' cut required for interim grade for slurry construction.
Middle Area	Placed a layer of slurry wall spoils and calcium sulfate spoils stabilized with cement and placed in several 6-inch thick lifts across the containment area before the cement cured.

Most of the upper soils within the DAPL containment area were placed as an engineered backfill during the installation of the slurry cutoff wall in 2000/2001. Filling operations were performed in a controlled manner under the supervision of a field engineer from GEI Consultants. Soil was place in lifts 9 to 12-inches thick and compacted with large vibratory rollers. Spot density tests were performed and soils were compacted to a minimum of 92 percent of the maximum dry density per ASTM D1557. Drum Area A had one 2-foot thick lift of excavated blast rock from the construction of the detention basin south of the containment area placed at the bottom of the excavation and compacted with numerous passes of a large vibratory roller. The area was then brought to final grade using imported sand and gravel from Benevento Sand and Gravel of Wilmington, MA.

Within the Middle Area (80,000 square feet) of the DAPL Containment Area, GEI estimated that a 6 to 18 inch layer of stabilized calcium sulfate and slurry spoils were mixed/stabilized with cement and placed as backfill in 6-inch thick lifts across the DAPL Containment Area before the cement cured. GEI reported that after two days of curing, the stabilized material had the consistency/strength of very stiff clay.

The installation of the cap proposed by NET in the November 2004 CRAM, includes the proof-rolling of the prepared subgrade, placement of a Tensar BX-1200 Geogrid over the subgrade to provide additional soil reinforcement, 6-inches of sand, and a 60-mil high density polyethylene (HDPE) geomembrane. This geomembrane is overlain by a non-woven geotextile and 9-inches of granular subbase and 6-inches of granular base material. A five inch thick asphalt cap would then be placed and graded at a slope of 1 percent radially to promote surface water run-off to a perimeter collection system located 4 feet beyond the exterior limits of the slurry wall. As indicated in Section 1.4 of the CRAM, entitled "Overview of Proposed Activities," only activities associated with the Materials Storage Area will be conducted within the DAPL Containment Area, and materials not sensitive to weather (sand and gravel, rock salt, wood chips, mulch, and lumber) will be loaded into or off of rail cars and temporarily stockpiled on the cap.

The design of the permanent cap involved modifying the existing grades beneath the temporary exposed cap (6-mil polyethylene installed in 2001 and upgraded in 2003 with an 8-mil scrim reinforced polyethylene membrane with taped seams) to form the proposed subgrade prior to the installation of the permanent cap. The subgrade will be proof-rolled and any soft or weaving or unsuitable underlying materials will be excavated and backfilled with imported bank run gravel backfill. A Tensar Biaxial Geogrid (BX-1200) will be installed over the entire subgrade to provide soil reinforcement. In addition, a 60-mil high density polyethylene geomembrane will be installed along with a non-woven geotextile, all of which provide additional soil reinforcement.

3. ***The design did not include analysis of the load bearing capacity of the concrete mats to be installed above the slurry wall at the points where the railroad sidings and the truck access roads cross the edge of the cap; these analyses are necessary to evaluate whether the***

integrity of the slurry wall will be adequately protected from the loads induced by rail and truck traffic.

This design information was presented in a Geotechnical Report entitled "DAPL Containment Area Slurry Wall Crossings" prepared by ECS for NET and dated September 21, 2004. A copy is now presented in Attachment A. A boring was drilled at each crossing location on both sides of the slurry wall, the subsurface conditions encountered at each location of the proposed slurry wall crossings were evaluated and an allowable soil bearing capacity at the rail and truck crossings was specified. The structural design of the reinforced concrete mats for the north and east wall crossings were performed by Cubellis Savietz Associates, civil engineers. The design of these mats that span the slurry trench were presented in the CRAM as drawing S-1. A summary of the recommendations made in this report is presented in the following paragraph.

The soil bentonite slurry cutoff wall was appropriately assumed to have minimal shear strength and was determined to have zero bearing pressure at the wall location. For the north crossing (rail and truck ramps) the soil encountered was a dense to very dense, medium to fine SAND, little Silt, trace fine Gravel (SP). The slurry trench in this location was 6 feet wide and an allowable design bearing pressure of 4,000 psf was used for the design of the mat which was 20 feet wide and extended 7 feet on either side of the trench. The mat was 110 feet long. For the east crossing (truck ramp only) the soil encountered varied with depth from a medium dense to loose fine SAND, trace Silt (SP) to a medium dense, coarse to fine SAND, trace Silt (SP). The slurry trench at this location is 3-feet wide and an allowable bearing pressure of 3,000 psf be used in the design of the mat in this area. At the southwest crossing, the wall is also 3 feet wide and subject to loadings from maintenance vehicles to sample wells/discharge weirs and to provide access to the Calcium Sulfate Landfill and the Bioremediation Cell. This crossing is reinforced with a Tensar Biaxial Geogrid (BX1200) which will be utilized for this location.

4. ***The one percent drainage grade proposed for the cap is substantially less than the 3 to 5 percent grade range that is typical for engineered caps.***

Typically a 3 to 5 percent grade is utilized when significant settlement of the underlying materials is anticipated (e.g. municipal landfills, soft clay, peat, etc.). The soils within the DAPL Containment Area as discussed in response #2 are granular and not subject to significant differential settlement. Based upon a review of the boring logs of the wells installed within the containment area and GEI's August 28, 2001 CRAM Status Report No. 2, organic or soft/compressible materials have been removed from within the DAPL Containment Area. In addition, a Geogrid, HDPE geomembrane, and a non-woven geotextile have been incorporated into the permanent cap which will provide additional reinforcement to the subgrade and minimize potential settlement of the underlying soils. Therefore, the slope proposed for the permanent cap is typical and appropriate to promote surface water runoff, and was selected based upon the materials storage end use that would operate within the DAPL Containment Area.

5. ***The suitability of high density polyethylene (HDPE) as a cap material cannot be reliably evaluated in the absence of a settlement analysis ((MADEP cap design guidance does not recommend use of HDPE for barriers that are susceptible to differential settlement).***

The potential for significant differential settlement of a 60-mil HDPE geomembrane has been determined to be negligible. In 2000, unsuitable soils were removed and the upper soils within the DAPL Containment Area were placed as an engineered backfill during the installation of the slurry cutoff wall in 2000/2001. Filling operations were performed in a controlled manner under the supervision of a field engineer from GEI Consultants. After regrading, the proposed cap includes the proof-rolling of the prepared subgrade, installation of a Tensar BX-1200 Geogrid over the subgrade to provide additional soil reinforcement, 6-inches of sand, and a 60-mil high density polyethylene (HDPE) geomembrane.

GeoInsight appears to cast doubt on the widespread usage of HDPE as a final capping material, yet HDPE has been used on dozens, if not hundreds, of containment areas, soil piles, and landfills throughout Massachusetts. HDPE has been routinely used to cap sites that are much more problematic that the DAPL Containment Area, and have been approved by MADEP, USEPA, and/or local municipalities within the immediate vicinity of Wilmington.

GeoInsight appears to selectively reference only Section 6.2.3.2 of the latest MADEP guidance document entitled "Guidance on the Use, Design, Construction, and Monitoring of Engineered Barriers," dated November 2002, where the following statement was made regarding such a synthetic flexible membrane layer: "At sites were significant post-construction differential settlement is possible, linear low density polyethylene (LLDPE) geomembranes are recommended, due to their superior elongation and flexibility characteristics."

A LLDPE is very similar in material construction to HDPE, but again this comment is not relevant for the conditions within the DAPL Containment Area since negligible settlement will occur, and HDPE is an appropriate impermeable cover as provided in the MADEP guidance document.

While certain aspects of the containment area cap proposed by NET are consistent with proposed MADEP Policy for an Engineered Barrier, it should be noted that the slurry wall and the DAPL Containment Area are not intended to be an Engineered Barrier as defined in the MCP. It is not intended to prevent access to, or to stabilize significantly contaminated *soil* that is located beneath the cap. It is strictly intended to significantly reduce the infiltration of water into the containment area, to facilitate the hydrologic containment of contaminated groundwater and Dense Non-Aqueous Phase Liquid (DAPL) at depth, so that it does not contribute to further groundwater or surface water impacts outside of the DAPL Containment Area.

6. ***The CRAM plan did not present specifications for the capping materials and grading soils nor for their placement, compaction, and quality control criteria and testing.***

The NET CRAM presented construction details for the permanent cap that are appropriate to support MADEP review and approval of the overall CRAM Plan. It is understood that MADEP may, as part of its review, request additional design elements, and geotechnical analysis, of the permanent cap, prior to issuing a final approval of the cap design. Included in the project specifications are the following selected sections that address the concerns raised and will be made available to MADEP and GeoInsight upon request:

Section 01110 – Summary of Work
Section 02210 – Earth Excavation, Backfill, Fill and Grading
Section 02221 – Imported Bank Run Gravel/Excavated Granular Fill Material
Section 02222 – Bedding Sand
Section 02223 – Gravel Subbase
Section 02224 – Gravel Base
Section 02343 – HDPE Geomembrane
Section 02375 – Non-Woven Geotextile
Section 02551 – Bituminous Paving
Section 02622 – Geogrid
Section 03200 – Concrete Reinforcement
Section 03300 – Cast-In-Place Concrete

7. ***The design did not include an analysis of the need for a gas collection and venting system under and through the cap.***

The installation of a gas collection and venting system are unnecessary, since the materials under the proposed permanent cap are sand, gravel, and cement stabilized materials, which cannot generate any perceptible gases. According to the CRAM Status Report No. 2, dated August 28, 2001, materials that could potentially decompose/generate methane had been removed from within the DAPL containment area during the slurry trench construction in 2000/2001. The existing temporary cap has no provisions for the collection or venting of any gas generated by the underlying materials within the DAPL Containment Area. Nevertheless, included in the design of the proposed cap design is a 6-inch thick layer of bedding sand which extends 4 feet beyond the limits of the slurry trench and is located between the Geogrid placed on the prepared subgrade and the HDPE geomembrane. Collected gases, if any, could follow this sand layer and vent to the atmosphere at the perimeter geomembrane anchor trench.

8. ***Section 1.2 of the CRAM plan indicated a third ramp onto the cap would be constructed at the southwest corner; however, the design drawings show only two ramps and do not illustrate the location or construction details of the third ramp. The adequacy of this ramp***

to protect the slurry wall and cap over which it must pass cannot be evaluated from the design information presented.

The location of this crossing is at slurry wall station 0+0. The detail for this crossing was presented on Sheet C-9 of the CRAM entitled: "Southwest Slurry Wall Crossing." The existing slurry wall crossing at the east end of the access road at slurry wall station 6+50 and also at the crossing for the existing access road to the Bioremediation Cell and Calcium Sulfate landfill at station 0+0 have not experienced any settlement/maintenance issues over the past four years. At this latter-most crossing, future activities are limited to stream monitoring activities and maintenance at the Calcium Sulfate landfill.

The existing containment wall cap consisted of a 12 feet wide layer of non-woven geotextile placed over the wall at El. 83.5. A 6-inch thick layer of compacted sand and gravel was placed over the geotextile and then a 14-feet wide strip of Geogrid. These materials will be left in place. The permanent cap will then be installed over the existing containment wall cap by 4 feet and will include the Geogrid, sand, geomembrane, non-woven geotextile, gravel subbase and base courses and asphalt pavement. Since NET proposes no activities associated with the slurry wall crossing at this location, and given the satisfactory past performance of the existing containment wall cap, a concrete mat was not recommended for this crossing, as detailed in the Geotechnical Report dated September 21, 2004 (Attachment A).

9. ***The analytical protocol proposed to evaluate the acceptability for discharge to the ground surface of collected groundwater is not adequate. Testing for pH and specific conductivity will not identify the presence of other COCs that may react with materials present in groundwater with potential adverse impacts on human and ecological receptors.***

ECS believes the analytical protocol is appropriate, based upon the recent and historical groundwater characterization as presented in the CRAM.

Extensive investigations have been performed site wide, and within the proposed NET facility area, over the last two years to identify the presence and extent of several additional contaminants of concern (COCs). The data from these investigations were considered in the FRA. As noted above, the current assessment of possible additional contaminants by MADEP and USEPA is based on the tentative identification of very low concentrations of organic compounds in groundwater that has been used for potable purposes, in the Maple Meadow Brook Aquifer, to the west of the development area.

As demonstrated in the FRA and the CRAM, the potential presence of additional COCs in groundwater at the Site is not a significant concern for the proposed NET development because the future use of the property, as proposed by NET, will not have a significant impact on groundwater, or result in exposures to groundwater or surface water, or soil gas, by site workers or visitors. The potential presence or absence of additional compounds of concern in soil in areas where subsurface soils may be disturbed, has been investigated to the extent feasible, and may be confirmed, with confirmatory sampling and analysis during construction. If subsurface conditions encountered during redevelopment are different from those reported, or a condition that could pose a significant risk to workers or others is observed, MADEP will be notified and an assessment will be made at that time as to what measures should be taken before construction activities proceed.

During excavation/installation of the concrete vault located within the Bulk Handling Area, localized dewatering may be required to allow the vault to facilitate construction, although not anticipated during the summer and fall months. Groundwater monitoring wells, installed by ECS in January 2004, indicated groundwater to be below the bottom of the proposed excavation. A review of existing adjacent monitoring wells data over a 10-year period indicated a potential for groundwater fluctuation which may result in it being encountered during spring months. A copy of the Geotechnical Report for the proposed building, dated April 5, 2004 is presented in Attachment B.

Prior to the start of construction, the wells within the building area and storm water detention basins will be monitored and based upon depth to groundwater, a temporary holding tank may be mobilized to hold any groundwater encountered during the vault installation. ECS will monitor for identified COCs as necessary and based upon analytical results, will either discharge directly to the ground as allowed under the MCP or transported to a licensed off site disposal facility (TSDF).

10. ***The redevelopment plan refers frequently to disturbance of contaminated soil and excavation (to depths of as much as 4 to 8 feet below grade) and regrading that will be required for redevelopment; ECS estimates that as much as 15,500 cubic yards of excess soil will be generated from these activities. Given the stated plans to reuse soil onsite where practicable, it appears that more than this amount may be disturbed. Disturbance and relocation of large volumes of soil around the site will impede the characterization of the nature and extent of impacts of additional COCs that may be identified by USEPA and MADEP; it will be substantially more difficult to interpret the locations of potential source areas using data collected from disturbed and relocated soil.***

The additional subsurface investigations that GeoInsight envisions at the Property, or the basis for believing that there are additional source areas beyond those already identified, were not identified by GeoInsight. With the possible exception of the foundations to the structure (beneath which the soil has been extensively characterized, and which will be re-evaluated upon excavation), all other structures are intended to be temporary, and NET understands that future assessment and/or remediation efforts required by MADEP or USEPA, including soil and groundwater testing or removal, could temporarily interrupt the use, or require the relocation of, these structures. The excavation and relocation of fill at the property will be within a well-defined area, and will be subject to a testing program approved by MADEP.

The intent of the design was to minimize the amount of excavation that would occur within the former manufacturing areas. As shown on Figure 2 of the NET CRAM entitled, "NET Development Area, Site Layout" significant quantities of imported backfill will be placed over the existing grade.

Attachment I to the Focused Feasibility Study (FFS) details the specific quantity estimates associated with the excavation for the building, storm water detention basins and connecting piping and rail installation. Most of the excavation quantities are associated with railroad track installation and proposed building, where a No Significant Risk condition were determined to exist (except for very limited areas) based upon a comparison to MADEP Standards. The excavation quantities resulted from a conservative assumption that a maximum excavation depth of up to 4-feet could be necessary, and ECS used this depth as an upper limit for project budgeting purposes. Excavation within the identified soil "hotspots," as noted in the Focused Site Characterization (FSC) and Focused Risk Assessment (FRA) (MACTEC, October 2004) were avoided. The location of these hot spots is shown in Figure 1and the COCs with associated proposed NET Development Activities are detailed in Table 1of the FFS (Appendix A) to the NET CRAM.

11. ***The CRAM Plan defines the structures to be constructed as temporary. However, the Plan describes the construction of a concrete vault that is 8 feet deep, 15 feet wide and 118 feet long, with a concrete floor 18-inches thick. This structure is to be overlain by a 46,800 square foot pre-engineered metal building or sprung structure being constructed on foundations 4 feet deep and approximately 180 feet by 260 feet. These structures would inevitably impede characterization and response actions that may be undertaken when a final list of COCs is determined by USEPA and MADEP.***

The proposed structures will not interfere with future investigations. The presence of the proposed building housing the Bulk Lifting Area, or any other structure, at the property will not preclude the further assessment or remediation of groundwater conditions at the Property. In fact, it is anticipated that the current groundwater monitoring programs that are being implemented at the property will be maintained during, and after construction of the NET facility.

NET is willing to cooperate with regulators and will allow access within any areas of the proposed structure for the installation and monitoring of existing and additional monitoring wells necessary for future characterization of COCs. If required, soils/groundwater beneath the concrete vault and building footings may be accessed for remediation efforts by the drilling of horizontal or angled borings. However, the NET CRAM dated November 18, 2004 documented that no COCs existed beneath the proposed building in groundwater. There is a limited area (Development HS) located within the building footprint where contaminated soil will be excavated and removed during construction. However, the FRA determined that these conditions do not pose an unacceptable risk to human health under the redevelopment and future use scenarios proposed by NET.

12. ***Redevelopment construction described in the CRAM Plan may impede access by investigators as they attempt to collect necessary information. This interference could make it more difficult to identify responsible parties and bring them to account for the full extent of their liabilities, by creating new scientific uncertainties and fueling disputes about the allocation of liability and contribution.***

    See the responses to comments 10, and 11. Olin Corporation is responsible for characterization/remediation of COCs identified by either USEPA or MADEP associated with past operations on the Property and will be permitted to do so in the future through the Purchase and Sale Agreement with NET.

Please feel free to contact either of us if you require further clarification or additional information.

Sincerely,
Environmental Compliance Services, Inc.

Nicholas C. D'Agostino, PE
Senior Geotechnical Engineer

Stephen J. Graham, PE, LSP
Project Manager

w/attachments

cc: Greg Erickson, Wilmington Board of Health
Michael Caira, Wilmington Town Manager
John Curran, Woburn Mayor
Jack Fralick, Woburn Board of Health
Christine Stewart, Wilmington Memorial Library, Olin Site Repository
Steve Morrow, Olin Corporation (2 copies)
Curt Richards, Olin Corporation
Margret Hanley, LSP, Sleeman Hanley & DiNitto
Robert Jones, III, New England Transrail, LLC
Ronald Klempner, New England Transrail, LLC